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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CB SURETY, LLC, et al.,

Defendants.

Civil Case No. 2:23-cv-02812-TLN-DB

NOTICE OF MOTION FOR A DEFAULT
JUDGMENT AND PERMANENT
INJUNCTION

Date: TBD

Time: TBD

Courtroom: Courtroom 27

Judge: Hon. Deborah Barnes

Please take notice that on a date to be selected by the Court, Plaintiff United States of America will, and hereby does, move pursuant to Rule 55(b)(2) of the Federal Rules of Civil

Procedure to enter a Default Judgment in this matter against Defendants Travis Smith, Stephen Christopher, Bryan Bass, CB Surety LLC, Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc., Bass Business Consultants, and Think Processing LLC (the “Defendants in Default”).

Entry of a Default Judgment is appropriate because the Defendants in Default have failed to appear or otherwise respond to the government’s Complaint within the time prescribed by Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure. This Motion will be based on this Notice of Motion and Motion, the Brief in Support, the Affidavit of Attorney Andrew K. Crawford, all pleadings, records, and other documents on file with the Court in this action, and on any other evidence as may be presented at the hearing of this matter.

Dated: July 25, 2024

Respectfully submitted,

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